

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK
WHITE PLAINS DIVISION**

IN RE

CHAPTER 11

SEARS HOLDINGS CORPORATION, ET AL.

CASE NO. 18-23538 (RDD)

DEBTOR

(Jointly administered)

NOTICE OF JEFFREY PFEIFFER'S MOTION FOR RELIEF FROM STAY

PLEASE TAKE NOTICE that, upon the Motion of Jeffrey Pfeiffer, a Creditor in this action, by his attorney David J. Gallagher, dated February 15, 2019, Creditor will move this Court before the Hon. Robert D. Drain at the Courthouse located at 300 Quarropas Street, White Plains, NY 10601, on March 21, 2019, at 10:00 a.m. E.T., or as soon thereafter as counsel may be heard, for an Order: a) pursuant to U.S.C. §362(d), terminating, lifting, or modifying the automatic stay arising from the filing of Debtor's petition for the limited purposes of allowing the Mr. Pfeiffer to prosecute to conclusion in the Circuit Court of Cook County, Illinois a personal injury and products liability claim against the Debtors to the extent of liability insurance coverage.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion shall be in writing and shall be filed with the Bankruptcy Court no later than March 14, 2019 at 4:00 p.m. (Eastern Time) (with a hard copy delivered directly to Chambers), and shall be served in accordance with the Amended Order Implementing Certain Notice and Case Management Procedures, entered on November 1, 2018 (ECF No. 405) and upon the undersigned and the parties entitled to notice thereof.

PLEASE TAKE FURTHER NOTICE that, if no Objections are timely filed and served with respect to the Motion, the relief requested may be granted without a hearing.

Dated: February 15, 2019

Chicago, Illinois.

/s/ David J. Gallagher
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